

January 23, 2003

FMCSA Docket No. FMCSA-2002-13295
U.S. Department of Transportation
Dockets Management Facility, Rm PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

To Whom It May Concern:

I am writing in support of the petition from the Oregon Department of Transportation for a two year renewable exemption from the federal regulations that mandate inspections on farm trucks. Approval of this request is critical to Oregon agriculture, and to Oregonians at large.

My family operates a 900 acre vegetable and seed farm in Oregon's Willamette Valley. To move the supplies and equipment we need to produce our crops, and to move those crops from field to market, we own and use seven trucks that are "F-plated" (farm plates) by the Oregon Department of Motor Vehicles. Although this may sound like a lot of transportation resources, each of these trucks average less than 5,000 miles total use each year. Most of our hauls are short (5-15 miles), and seldom on major highways. Even during the season of use, these trucks spend most of their time not on the road, but in fields picking up loads, servicing farm machinery with production supplies, or waiting to be unloaded at processing plants.

In spite of this limited use, these trucks must be reliable, dependable, and safe. To achieve this, all of our trucks go through our own service shop each winter for full inspection and maintenance of all systems, including brakes, lights, suspension systems, and cargo containment equipment. I know of few commercial truckers who do inspection and service with so little actual use. Perhaps our biggest incentive to properly maintain our trucks is the fact that the drivers are often our own family members, neighbors, long-time employees, or ourselves. We don't want to put these people at risk!

Government inspection of F-plated trucks in Oregon would be virtually impossible, especially considering the very seasonal nature of our business. Oregon officials are loathe to begin such a program, in light of the excellent safety record of F-plated vehicles in Oregon: They would rather spend their time and limited resources working on the problems known to exist. The alternative of losing federal funds to support Oregon's MCSAP programs is equally undesirable, both for Oregon, and for the U.S. Department of Transportation.

For these and other reasons, I urge the Department to accept Oregon's petition to exempt farm trucks from inspections. Should you require further information, please don't hesitate to contact me at the number below.

Sincerely,

Mark Dickman

